

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: BAIR HUGGER FORCED AIR
WARMING DEVICES PRODUCTS
LIABILITY LITIGATION

MDL No. 15-2666 (JNE/FLN)

This Document Relates To:
All Actions

**AFFIDAVIT OF BRIDGET AHMANN
IN SUPPORT OF DEFENDANTS'
MOTION TO COMPEL
PRODUCTION OF DOCUMENTS ON
AUGUSTINE'S PRIVILEGE LOG**

I, Bridget Ahmann, declare as follows:

1. I am an attorney at Faegre Baker Daniels LLP, and one of the attorneys representing 3M Company ("3M") and Arizant Healthcare Inc. ("Arizant") (collectively "Defendants") in this litigation. I submit this affidavit in support of Defendants' Motion to Compel Production of Documents on Augustine's Privilege Log. Unless otherwise stated, the facts set forth herein are based upon my personal knowledge, information, and belief.

2. Attached as **Exhibit A** is a true and correct copy of Scott Augustine's Affidavit, dated December 12, 2016.

3. Attached as **Exhibit B** is a true and correct copy of Scott Augustine's Presentation, dated September 27, 2016 (Augustine_0028804).

4. Attached as **Exhibit C** is a true and correct copy of Rosie Bartel's Email to J. Randall Benham, dated February 3, 2014 (Augustine_0015613).

5. Attached as **Exhibit D** is a true and correct copy of Rosie Bartel's Email to J. Randall Benham, dated February 3, 2014 (Augustine_0015695).

6. Attached as **Exhibit E** is a true and correct copy of Rosie Bartel's Email to J. Randall Benham, dated February 6, 2014 (Augustine_0015599).

7. Attached as **Exhibit F** is a true and correct copy of Rosie Bartel's Email to J. Randall Benham, dated May 21, 2014 (Augustine_0015690).

8. Attached as **Exhibit G** is a true and correct copy of Rosie Bartel's Email to J. Randall Benham, dated July 28, 2015 (Augustine_0015667).

9. Attached as **Exhibit H** is a true and correct copy of Scott Augustine's December Privilege Log, produced to Defendants on December 22, 2016. For the Court's convenience, we have inserted index numbers for each of the entries, which were not on the copies provided by Scott Augustine's counsel.

10. Attached as **Exhibit I** is a true and correct copy of Order, *Walton v. 3M Co.*, No. 4:13-cv-01164 (S.D. Tex. May 19, 2015), ECF No. 120.

11. Attached as **Exhibit J** is a true and correct copy of Scott Augustine's August Privilege Log, produced to Defendants on August 17, 2016. For the Court's convenience, we have inserted index numbers for each of the entries, which were not on the copies provided by Scott Augustine's counsel.

12. Attached as **Exhibit K** is a true and correct copy of Scott Augustine's Letters to Hospitals, dated August 10, 2016 (Augustine_0027067).

13. Attached as **Exhibit L** is a true and correct copy of J. Randall Benham's Letter to E. Holden, dated April 15, 2015.

14. Attached as **Exhibit M** is a true and correct copy of J. Randall Benham's Affidavit, dated September 29, 2015.

15. Attached as **Exhibit N** is a true and correct copy of Scott Augustine's January Privilege Log, produced to Defendants on January 6, 2016. For the Court's convenience, we have inserted index numbers for each of the entries, which were not on the copies provided by Scott Augustine's counsel.

16. Attached as **Exhibit O** is a true and correct copy of Scott Augustine's Electronic Newsletter, dated April 23, 2013 (Augustine_0031412).

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

January 19, 2017

/s/Bridget M. Ahmann

Bridget M. Ahmann